

# Morgan Lewis

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July 18, 2025

**VIA ECF**

Hon. Dale E. Ho, USDJ  
United States District Court for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Hon. Robert W. Lehrburger, USMJ  
United States District Court for the Southern District of New York  
500 Pearl St., Courtroom 1960  
New York, NY 10007-1312

**Re: *Lee v. Delta Air Lines, Inc.*, Case No. 1:22-cv-08618-DEH-RWL**

Your Honors:

We represent Defendant Delta Air Lines, Inc. (“Delta”) in the above-referenced action. We write, pursuant to Judge Lehrburger’s Order, dated October 23, 2024 (Dkt. 113), and Item 12 of Judge Lehrburger’s form Civil Case Management Plan and Scheduling Order, to notify the Court of Delta’s intent to file a motion for summary judgment as to all of Plaintiff’s remaining claims in this action. Delta understands that—pursuant to Item 12 of Judge Lehrburger’s form Civil Case Management Plan and Scheduling Order—the operative deadline for filing such motion is August 18, 2025, which is 30 days following the close of discovery, i.e., today.

\* \* \*

We thank the Court in advance for its consideration of Delta’s forthcoming submission.

Respectfully submitted,

/s/ *Michael F. Fleming*

Michael F. Fleming

C: Plaintiff (via ECF; email)

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